

Estimated Hearing Date: To be determined by the Court

Objection Deadline: To be determined by the Court

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of  
THE COMMONWEALTH OF PUERTO RICO,  
*et al.*

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**BELFOR USA GROUP, INC., dba BELFOR PROPERTY RESTORATION'S FURTHER  
CONSENTED MOTION FOR EXTENSION OF TIME TO FILE REPLY TO ECF 24589**

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

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TO THE HONORABLE LAURA TAYLOR SWAIN,  
UNITED STATES DISTRICT JUDGE:

COMES NOW, **BELFOR USA GROUP, INC., dba “BELFOR PROPERTY RESTORATION”**), represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. BELFOR USA GROUP, INC. (“BELFOR”) respectfully prays for an extension of time of thirteen (13) days, lapsing on Wednesday, August 23, 2023, to file its reply to the Financial Oversight and Management Board for Puerto Rico’s (“Board”) objection at ECF 24589 to the motion for payment of administrative claim filed by BELFOR.

2. BELFOR is in the process of locating additional evidence which could allow the parties to reach a solution to this contested matter, however, there is a substantial amount of documents involved and we are presently continuing their analysis.

3. The Board, through its counsel of record Proskauer, has graciously consented to the instant further request.

4. The instant request will not unduly cause prejudice or cause unjustified delay in this matter.

### **NOTICE**

5. Notice has hereby been served by CM/EF and on the Master Service List posted on the website of the Debtors’ claims and noticing agent, by e-mail.

6. No prior request for the relief sought herein has been made to this Court or to any other Court.

WHEREFORE, BELFOR PROPERTY RESTORATION respectfully prays that this Honorable Court grant it an extension of time of thirteen (13) days, until August 23, 2023, to file its reply to the Financial Oversight and Management Board for Puerto Rico’s (“Board”) objection at ECF

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24589 to the motion for payment of administrative claim filed by BELFOR, with any other relief in its favor the Court deems proper.

RESPECTFULLY SUBMITTED.

Dated: August 10, 2023

Respectfully submitted,

REICHARD & ESCALERA, LLC

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